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SHAWN CORTEZ
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SHAWN CORTEZ,

15 Defendant.
16

Case No. 1:25-cr-00027-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Michael Tierney, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Shawn Cortez, that the status conference currently
20 scheduled for August 27, 2025, at 1:00 p.m. may be continued to December 10, 2025, at 1:00
21 p.m.

22 The parties agree and stipulate, and request that the Court find the following. Initial
23 discovery has been provided in this matter. The defense is in the process of reviewing this
24 discovery, discussing the discovery with his client, and researching and investigating all aspects
25 of this case. The government has provided a plea agreement and counsel has had initial
26 discussions with Mr. Cortez regarding the proposed agreement. Counsel for Mr. Cortez requires
27 additional time to look into and research issues that may impact resolution and sentencing in this
28 matter and to further discuss the proposed resolution with Mr. Cortez. In order to accomplish

1 this, the parties are in agreement to continue this matter to December 10, 2025, for a further
2 status conference.

3 Additionally, Mr. Cortez is currently participating in the Teen Challenge Reedley year-
4 long residential treatment and rehabilitation program. Mr. Cortez entered the program on
5 February 10, 2025, and is now just over half-way through the program. Counsel for Mr. Cortez
6 was provided a progress letter from Teen Challenge Reedley on August 19, 2025, that indicates
7 that he “has been actively participating in the Central Valley Teen Challenge [program].” It
8 further indicates that “[i]t is the staff’s observation that Shawn is making steady, measurable
9 progress in the areas of recovery, personal responsibility, and spiritual growth. Based on his
10 current trajectory, we are confident he is committed to completing the program successfully and
11 maintaining a sober lifestyle thereafter.” This letter has been provided to counsel for the
12 government and to Mr. Cortez’s Pretrial Services Officer.

13 The requested continuance in this case will conserve time and resources for the parties
14 and the Court. Counsel for defendant believes that failure to grant the above-requested
15 continuance would deny him the reasonable time necessary for effective preparation, taking into
16 account the exercise of due diligence. The government does not object to the continuance.

17 Based on the above-stated findings, the ends of justice served by continuing the case as
18 requested outweigh the interest of the public and the defendant in a trial within the original date
19 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
20 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period from August
21 27, 2025, to December 10, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§
22 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by
23 the Court at defendant’s request on the basis of the Court’s finding that the ends of justice served
24 by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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Respectfully submitted,

ERIC GRANT
United States Attorney

Date: August 19, 2025

/s/ Michael Tierney
MICHAEL TIERNEY
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: August 19, 2025

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
SHAWN CORTEZ

ORDER

IT IS SO ORDERED. The status conference currently scheduled for August 27, 2025, at 1:00 p.m. is hereby continued to **December 10, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. The time period from August 27, 2025, to December 10, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: August 20, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE